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February 26, 2025


VIA ECF

Hon. Jennifer L. Rochon
United States District Court, S.D.N.Y.
500 Pearl Street, Room 1010
New York, NY 10007

The request for redactions is GRANTED. The January 14, 2025 hearing transcript shall be filed with counsel's noted redactions.

SO ORDERED.

Dated: January 26, 2025
New York, New York


JENNIFER L. ROCHON
United States District Judge

RE: *Doolittle v. Bloomberg L.P.*, No. 22-CV-09136 (JLR)
Letter Motion to Redact Portions of January 14, 2025 Hearing Transcript

Dear Judge Rochon:

Pursuant to the Southern District of New York's Notice concerning Electronic Availability of Civil Transcripts of Proceedings Before U.S. District and Magistrate Judges, Section 4(B) of Your Honor's Individual Rules of Practice in Civil Cases, Standing Order 19-MC-00583, and Section 6 of the Southern District of New York Electronic Case Filing Rules & Instructions, Plaintiff submits this letter motion to redact certain portions of the transcript of the parties' January 14, 2025 Pre-Motion Conference with the Court. Ms. Doolittle seeks to redact only those lines that concern sensitive information disclosed in the parties' pre-motion letters concerning the testimony of Bloomberg's expert, Ronni Lee Seltzer, M.D. (Dkt. 132) and Ms. Doolittle's expert, Carole Lieberman, M.D., M.P.H. (Dkt. 136), that were discussed on the record. The Court has previously allowed such information to be filed under seal (Dkts. 140, 154). Specifically, Ms. Doolittle seeks to redact the following lines: 3:6-16, 4:1-8:19, 16:7-14 (references to sensitive medical information) and 14:23-15:2 (references to a third party's employment history). The information in these lines of the transcript is categorized as "information requiring caution" under Section 4(B)(i) of Your Honor's Individual Rules and has been recognized by Your Honor as information over which there is a strong privacy interest. *See* Dkt. 140.

While Rule 4(B)(i) of Your Honor's Individual Rules states that Court approval is not required to seal or redact such information, the Southern District of New York's Notice concerning Electronic Availability of Civil Transcripts of Proceedings Before U.S. District and Magistrate Judges requires parties seeking to redact from transcripts information other than those personal identifiers listed in Federal Rule of Civil Procedure 5.2 to "make the appropriate application to the assigned judicial officer and serve a copy on the court reporter." Accordingly, Ms. Doolittle makes this application to Your Honor and will serve a copy on the court reporter.

Respectfully submitted,

/s/ Daniel Kotchen
Daniel Kotchen
Counsel for Plaintiff

CC: All counsel of record via CM/ECF